



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JPL/FJN
F. #2014R01920

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 15, 2020

By ECF and E-mail

The Honorable Dora L. Irizarry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Daniel Rendon-Herrera
Criminal Docket No. 14-625 (S-3) (DLI)

Dear Judge Irizarry:

The government respectfully writes to request that the Court adjourn the plea hearing in this matter, which had been scheduled for June 17, 2020 at 10:00 a.m., for approximately 60 days, and that the intervening time be excluded from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

Due to the ongoing COVID-19 pandemic, see, e.g., E.D.N.Y. Administrative Order 2020-15-1, the parties believe that the additional time is necessary to allow them to complete plea negotiations in a safe and efficient manner, and for the defendant to have sufficient time to meet in person with defense counsel about these matters without taking unnecessary health risks. Adjournment of the plea hearing in this matter is also requested because the parties' preference is that any such plea be conducted in person, which is also not viable at this time due to the ongoing pandemic.

For the reasons set forth in this joint request for an adjournment, including that the parties continue to engage in plea negotiations, the government also respectfully requests that the Court order that the intervening time be excluded from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

Finally, we have spoken with defense counsel about this matter, who joins in this request in all respects.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

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